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TO:	FROM:
Examiner Thomas Beach	Henry C. Query, Jr.
COMPANY:	DATE:
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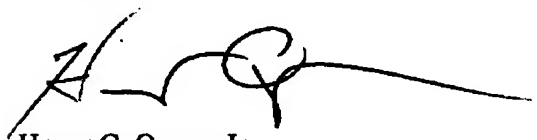
SUBJECT:
U.S. Patent Application No. 10/817,391
Inventor(s): Bartlett et al.
Filed: 04/02/2004
For: FLOW COMPLETION SYSTEM
Attorney Docket No.: FMCE-P015D

Dear Examiner Beach:

Enclosed in connection with the above-referenced application is a Response to Final Office Action, which is responsive to the Final Office Action dated July 25, 2005.

Sincerely,



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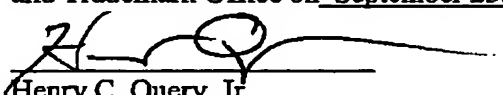

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FMCE-P015D

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of: Bartlett et al.	)	
	)	
Serial No.: 10/817,391	)	Group Art Unit: 3671
	)	
Filed: 04/02/2004	)	Examiner: T. Beach
	)	
For: FLOW COMPLETION SYSTEM	)	

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Commissioner for Patents
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Response to Final Office Action

This communication is responsive to the Final Office Action dated July 25, 2005.

Reconsideration of the above-identified application is respectfully requested.

Claims 1-4, 12-15, 22 and 23 stand rejected under 35 U.S.C. 102(e) as being anticipated by Baskett et al. (U.S. Patent Application Publication No. 2002/0011336 A1). In response to applicants' argument that Baskett does not anticipate the claims because element 10 is not a tubing hanger (see 04/27/05 Response to Office Action, page 6, lines 5 et seq.), the Examiner contends that element 10 functionally acts as an extension of the tubing hanger 4 since the upper end of element 10 allows for the hanging of a production string and the stab 12 sealingly mates element 10 with the tubing hanger 4 (07/25/05 Office Action, paragraph 3).

Applicants note that the instant application is a continuation of Application No. 10/683,936, many of whose claims were also rejected as being anticipated by Baskett. In a telephone interview with the Examiner on September 9, 2005 to discuss the rejection in Application No. 10/683,936, the Examiner indicated that the undersigned's arguments for why Baskett's element 10 cannot be considered to be part of the tubing hanger 4 were persuasive. These arguments are pertinent to the instant rejection and will therefore be repeated.

During the telephone interview of September 9, 2005, the undersigned argued that element 10 of Baskett cannot be considered to be part of the tubing hanger 4 for the following reasons. First, Baskett identifies element 10 as a crossover assembly (paragraph 59, lines 1-2), while the tubing hanger is identified only by reference number 4 (paragraph 58, lines 1-3). Second, the crossover assembly 10 is installed in the tree 2 (paragraph 59, lines 1-2), while the tubing hanger 4 is installed in the wellhead 6 (paragraph 58, lines 1-3). Third, interposed between the crossover assembly 10 and the tubing hanger 4 are a crossover stab 12 and a sliding valve 16 (Figure 1; paragraph 59, line 4; paragraph 60, lines 7-8). Fourth, the function of the tubing hanger is to support the production tubing 7 (paragraph 58, lines 10-14), while the purpose of the crossover assembly 10 is to allow the tree 2 and the tubing hanger 4 to be retrieved independently of each other (paragraph 10, lines 1-6).

The undersigned also argued that the installation sequence for Baskett's completion system provides further evidence that the crossover assembly 10 does not functionally act as part of the tubing hanger 4. As shown in Figures 3

and 4, the tubing hanger 4 is first installed in the wellhead 6 independent of the crossover assembly 10. Of significance, Figure 4 shows that the tubing hanger 4 is the sole component supporting the production tubing 7 (which is unnumbered in this Figure). Only after the tubing hanger 4 is installed in the wellhead 4 is the crossover assembly 10 installed. In this regard, Figure 5 shows that the crossover assembly 10 is first installed in the tree 2 and that these two components are then landed as a unit on the wellhead 6.

Thus, the tubing hanger 4 is clearly the only component which supports the tubing string 7. Moreover, since the crossover assembly 10 is supported in the tree 2, this component necessarily does not function to support the tubing string 7. Therefore, the crossover assembly 10 does not functionally act as an extension of the tubing hanger 4.

With respect to independent claims 1, 12 and 22, therefore, Baskett does not disclose a tubing hanger having a production bore in which two closure members are mounted. Rather, Baskett teaches mounting the first and second plugs 24, 26 in the bore of the crossover assembly 10, not the tubing hanger 4.

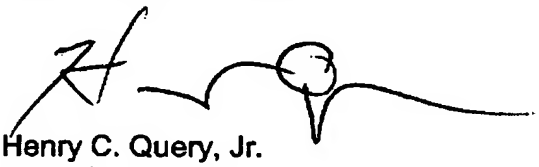
Therefore, Baskett does not anticipate claims 1, 12 and 22. Furthermore, since claims 2-4, 13-15 and 23 depend from claim 1, these claims are not anticipated by Baskett for the reasons stated above.

The Examiner has indicated that claims 5-11, 16-21 and 24 would be allowed if they are rewritten in independent form to include the limitations of their base and intervening claims. However, these claims depend from claims 1, 12

and 22, which applicants maintain are patentable. Therefore, applicants submit that claims 5-11, 16-21 and 24 do not need to be rewritten.

In light of the foregoing, claims 1-24 are submitted as allowable. Favorable action is solicited.

Respectfully submitted,



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